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*Attorneys for Safeco Insurance  
Company of America*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SAFECO INSURANCE COMPANY OF  
AMERICA, a foreign corporation,

Plaintiff,

v.

RIP VAN 899, LLC, a Nevada limited  
liability company; ESTATE OF  
CHRISTOPHER ERIN BROWN, decedent  
and Nevada citizen; CHERI A. BROWN,  
individually and as Special Administrator of  
the ESTATE OF CHRISTOPHER ERIN  
BROWN, a Nevada citizen; and  
CHRISTOPHER DAVID KIRK BROWN, a  
minor and heir of the ESTATE OF  
CHRISTOPHER ERIN BROWN, a Nevada  
Citizen, by and through his paternal  
grandmother and legal guardian, CHERI A.  
BROWN, a Nevada Citizen.

Defendants.

RIP VAN 899, LLC, a Nevada limited  
liability company,

Counterclaimant,

vs.

SAFECO INSURANCE COMPANY OF  
AMERICA, a foreign corporation

Counterdefendant.

Case No. 2:23-cv-01417-ART-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE JOINT  
DISCOVERY PLAN BY SEVEN DAYS  
TO PERMIT THIRD-PARTY  
DEFENDANTS TO PARTICIPATE**

1 RIP VAN 899, LLC, a Nevada limited  
 2 liability company,  
 3 Third-Party Plaintiff,  
 4 vs.  
 5 MIKE PAYNE, an individual; LEGACY  
 6 INSURANCE GROUP, a Domestic  
 7 Corporation  
 8 Third Party Defendants.

9 IT IS HEREBY STIPULATED between Plaintiff and Counterdefendant SAFECO  
 10 INSURANCE COMPANY OF AMERICA (“Safeco”), Defendant, Counterclaimant, and Third-  
 11 Party Plaintiff RIP VAN 899, LLC (“Rip Van”), and Defendants the ESTATE OF CHRISTOPHER  
 12 ERIN BROWN, CHERI A. BROWN, and CHRISTOPHER DAVID KIRK BROWN (the “Brown  
 13 Defendants”) (collectively the “parties”), by and through their respective counsel of record,  
 14 pursuant to LR IA 6-1, IA 6-2 and 7-1, that the time to file a joint discovery plan be extended by  
 15 seven (7) days to March 6, 2024. The agreed-to extension is supported by good cause and is made  
 16 in good faith and stipulated between the aforementioned parties for the following reasons:

17 (1) Not all parties have formally appeared in this action. Third-Party Defendants MIKE  
 18 PAYNE and LEGACY INSURANCE GROUP (collectively “Legacy”) have not yet filed a  
 19 response to Rip Van’s Third-Party Complaint.

20 (2) On February 7, 2024, Legacy and Rip Van stipulated, and this Court ordered, that  
 21 Legacy have until February 28, 2024 to respond to the Third-Party Complaint. (ECF No. 30).

22 (3) On February 20, 2024, this Court denied Safeco’s Motion for a Stay of Discovery  
 23 pending resolution of its pending dispositive motion. (ECF No. 37). In the Court’s Order, the  
 24 parties were ordered to file a joint discovery plan by February 28, 2024. *Id.* This is the same date  
 25 by which Legacy must file its response to the Third-Party Complaint and enter the action.

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(4) So that Legacy may focus on responding to the Third-Party Complaint and then be able to meaningfully participate in the Rule 26 conference, the parties request that the deadline to file a joint discovery plan be extended by seven (7) days to March 6, 2024.

Dated this 23<sup>rd</sup> day of February 2024.

CLYDE & CO US LLP

LIN LAW GROUP

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By: /s/ Michael M. Lin

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**ORDER**

**IT IS SO ORDERED**

  
UNITED STATES MAGISTRATE JUDGE

DATED: February 26, 2024